

**REMARKS**

Claims 1-20 are currently pending, wherein new claims 18-20 have been added. Applicant respectfully requests favorable reconsideration in view of the remarks presented herein below.

At the outset, Applicant notes with appreciation the indication that claims 4-6 contain allowable subject matter and would be allowed if re-written in independent form.

In paragraph 2, the Office Action rejects claims 1-3 and 7-17 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,196,459 to Goman et al. ("Goman"). Applicant respectfully traverses this rejection.

It is well known that in order to support a rejection under 35 U.S.C. §102, the cited reference must teach each and every claimed element. In the present case, claims 1-3 and 7-17 are not anticipated by Goman for at least the reason that Goman fails to disclose each and every claimed element.

Independent claim 1 defines a smart card customizing system. The system includes, *inter alia*, at least one customizing machine equipped with at least one customizing station that sends customizing requests; at least one customizing data server that delivers customizing data; and at least one management interface connected to said customizing machine and to said data server by a bi-directional link, said management interface receiving said requests and transmitting them to at least one of said servers, and receiving the corresponding response and transmitting it to the requesting customizing station.

Goman discloses a smart card personalization system for controlling programming of smart cards across a plurality of personalization stations. The system includes a personalization server interface; a plurality of personalization stations; a card issuer management system; and a controller. According to the system of Goman, the personalization station 130 presents the card object identifier (received from the smart card personalization controller 120) to the server 100 in order to initiate access to the data

services, security services or support services needed to complete the smart card personalization. Upon receiving the card object identifier from the personalization station 130, the smart card personalization server 1000 translates the card object indicated by the card object identifier and passes the resulting sequence of commands and/or data to the personalization station 130. The personalization station passes the commands and data received from the server directly to the smart card.

In rejecting claim 1, the Office Action asserts that the card issuer management system of Goman in combination with controller 120 is equivalent to the claimed management interface. However, Goman fails to disclose that the card issuer management system alone, or in combination with controller 120, receives customizing requests from the personalization stations and transmits them to the personalization server as claimed. To the contrary, Goman explicitly discloses that the personalization station initiates the personalization process by transmitting the object identifier to the personalization server. Accordingly, the combination of the card issuer management system and controller 120 as disclosed in Goman is not equivalent to the claimed management interface. Therefore, Goman fails to anticipate independent claim 1.

Independent claim 13 defines a smart card customizing system that includes, *inter alia*, a plurality of customizing stations; a plurality of devices that deliver customizing data; and a management interface connected to each of said customizing stations and said devices via respective serial links, wherein said management interface is responsive to requests received from said customizing stations to deliver them to an available one of said devices, and to transmit customizing data delivered by said devices in response to said requests to the requesting customizing stations.

In rejecting claim 13, the Office Action appears to assert that the personalization sever 100 of Goman corresponds to the claimed management interface, the personalization stations 130 correspond to the claimed plurality of customizing stations, and the additional data sources 206 correspond to the claimed plurality of devices. It is respectfully submitted,

however, that this interpretation of Goman does not support the rejection of the claims. In particular, claim 13 recites that the management interface receives requests from the customizing stations and delivers them to an available one of the devices. The management interface also receives the corresponding data delivered by the devices and transmits it to the requesting customizing station. Thus, in the context of claim 13, the management interface functions as a communication gateway between the customizing stations and the devices.

Nowhere in Goman is there any disclosure that the requests received from the personalization stations are delivered to the additional data sources. To the contrary, Goman clearly discloses that the *personalization server software* 305 executing in a processor in the personalization server 100 *processes* the personalization card *objects* utilizing both local and external resources. Therefore, it is the server 100 that processes the requests and not the devices as claimed. Accordingly, independent claim 13 is not anticipated by Goman.

Claims 2, 3, 7-12 and 14-17 variously depend from independent claims 1 and 13. Therefore, claims 2, 3, 7-12 and 14-17 are patentably distinguishable over Goman for at least those reasons presented above with respect to claims 1 and 13.

Applicant notes that although dependent claims 2, 7-12 and 15-17 have been rejected, the Office Action does not identify any passage in Goman which discloses or otherwise suggests the additional elements recited these claims. Accordingly, should the Examiner maintain these rejections in a future Action, the Examiner is requested to point out by column and line number where Goman discloses each of the claimed elements in order to provide Applicant appropriate information with which to respond.

New claims 18-20 are patentably distinguishable over Goman for at least the reason that Goman fails to disclose a customizing machine that comprises a microprocessor, a reader/encoder and a first and second computer link as claimed.

This application is in condition for allowance. Notice of same is earnestly solicited.  
Should the Examiner have any questions regarding this application, she is invited to call the undersigned at the telephone number provided below.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: December 9, 2003

By: Penny L. Caudle  
Penny L. Caudle  
Registration No. 46,607

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620